

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Nancy Smith,	:	Case No. 1:24-cv-00344
Plaintiff,	:	Judge David Ruiz
v.	:	Magistrate Judge Jennifer Dowdell Armstrong
City of Lorain, et al.	:	
Defendants.	:	<u>JURY DEMAND ENDORSED HEREON</u>

**ANSWER OF DEFENDANT LORAIN COUNTY, OHIO
TO PLAINTIFF'S COMPLAINT (DOC. 1)**

Now comes Defendant Lorain County, Ohio ("Lorain County"), by and through counsel, and for its Answer to Plaintiff's Complaint (the "Complaint") herein states as follows:

1. The allegations in paragraph 1 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 1 of the Complaint.
2. The allegations in paragraph 2 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 2 of the Complaint.
3. Lorain County denies the allegations in paragraph 3 of the Complaint.
4. Lorain County denies the allegations in paragraph 4 of the Complaint. Further answering, Lorain County avers that Plaintiff has not yet obtained a wrongful imprisonment determination from the Lorain County Court of Common Pleas.
5. Lorain County denies the allegations in paragraph 5 of the Complaint for want of knowledge.

6. Lorain County denies the allegations in paragraph 6 of the Complaint for want of knowledge.

7. Lorain County denies the allegations in paragraph 7 of the Complaint for want of knowledge.

8. Lorain County denies the allegations in paragraph 8 of the Complaint for want of knowledge.

9. Lorain County denies the allegations in paragraph 9 of the Complaint for want of knowledge.

10. Lorain County denies the allegations in paragraph 10 of the Complaint for want of knowledge.

11. Lorain County denies the allegations in paragraph 11 of the Complaint for want of knowledge.

12. Lorain County denies the allegations in paragraph 12 of the Complaint for want of knowledge.

13. Lorain County denies the allegations in paragraph 13 of the Complaint for want of knowledge.

14. Lorain County denies the allegations in paragraph 14 of the Complaint for want of knowledge.

15. Lorain County denies the allegations in paragraph 15 of the Complaint for want of knowledge.

16. Lorain County denies the allegations in paragraph 16 of the Complaint for want of knowledge.

17. Lorain County denies the allegations in paragraph 17 of the Complaint for want of knowledge.

18. Lorain County denies the allegations in paragraph 18 of the Complaint for want of knowledge.

19. Lorain County denies the allegations in paragraph 19 of the Complaint for want of knowledge.

20. Lorain County denies the allegations in paragraph 20 of the Complaint.

21. Lorain County denies the allegations in paragraph 21 of the Complaint.

22. Lorain County denies the allegations in paragraph 22 of the Complaint.

23. Lorain County denies the allegations in paragraph 23 of the Complaint.

24. Lorain County denies the allegations in paragraph 24 of the Complaint.

25. Lorain County denies the allegations in paragraph 25 of the Complaint.

26. Lorain County denies the allegations in paragraph 26 of the Complaint.

27. Lorain County denies the allegations in paragraph 27 of the Complaint. Further answering, Lorain County avers that Plaintiff has not yet obtained a wrongful imprisonment determination from the Lorain County Court of Common Pleas.

28. The allegations in paragraph 28 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 28 of the Complaint.

29. Lorain County denies the allegations in paragraph 29 of the Complaint.

30. Lorain County denies the allegations in paragraph 30 of the Complaint.

31. Lorain County denies the allegations in paragraph 31 of the Complaint.

32. Lorain County denies the allegations in paragraph 32 of the Complaint.

33. The allegations in paragraph 33 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 33 of the Complaint.

34. The allegations in paragraph 34 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 34 of the Complaint.

35. The allegations in paragraph 35 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 35 of the Complaint.

36. The allegations in paragraph 36 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 36 of the Complaint.

37. Lorain County denies the allegations in paragraph 37 of the Complaint.

38. Lorain County denies the allegations in paragraph 38 of the Complaint.

39. For the allegations in paragraph 39 of the Complaint, Lorain County admits only that on February 25, 2022, Lorain County Common Pleas Judge D. Christopher Cook granted a new trial to Plaintiff in case number 94CR045368. Lorain County denies the remaining allegations in paragraph 39 of the Complaint.

40. Lorain County admits the allegations in paragraph 40 of the Complaint.

41. The allegations in paragraph 41 of the Complaint contain statements regarding Plaintiff's subjective reasoning behind filing this lawsuit to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 41 of the Complaint.

42. The allegations in paragraph 42 of the Complaint contain statements regarding Plaintiff's subjective reasoning behind filing this lawsuit to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 42 of the Complaint.

43. The allegations in paragraph 43 of the Complaint contain legal conclusions to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 43 of the Complaint.

44. The allegations in paragraph 44 of the Complaint contain legal conclusions to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 44 of the Complaint.

45. The allegations in paragraph 45 of the Complaint contain legal conclusions to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 45 of the Complaint.

46. Lorain County denies the allegations in paragraph 46 of the Complaint for want of knowledge.

47. Lorain County denies the allegations in paragraph 47 of the Complaint for want of knowledge.

48. For the allegations in paragraph 48 of the Complaint, Lorain County admits only that Defendant City of Lorain is a political subdivision organized under the laws of the State of Ohio. Lorain County denies the remaining allegations in paragraph 48 of the Complaint.

49. For the allegations in paragraph 49 of the Complaint, Lorain County admits only that Defendant Jonathan Rosenbaum worked as an assistant prosecutor in Lorain County in 1994. Lorain County denies the remaining allegations in paragraph 49 of the Complaint.

50. For the allegations in paragraph 50 of the Complaint, Lorain County admits only that Lorain County is a political subdivision organized under the laws of the State of Ohio. Lorain County denies the remaining allegations in paragraph 50 of the Complaint.

51. Lorain County denies the allegations in paragraph 51 of the Complaint.

52. The allegations in paragraph 52 of the Complaint contain legal conclusions to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 52 of the Complaint.

53. Lorain County denies the allegations in paragraph 53 of the Complaint for want of knowledge.

54. Lorain County denies the allegations in paragraph 54 of the Complaint for want of knowledge.

55. Lorain County denies the allegations in paragraph 55 of the Complaint for want of knowledge.

56. Lorain County denies the allegations in paragraph 56 of the Complaint for want of knowledge.

57. Lorain County denies the allegations in paragraph 57 of the Complaint for want of knowledge.

58. Lorain County denies the allegations in paragraph 58 of the Complaint for want of knowledge.

59. Lorain County denies the allegations in paragraph 59 of the Complaint for want of knowledge.

60. Lorain County denies the allegations in paragraph 60 of the Complaint for want of knowledge.

61. Lorain County denies the allegations in paragraph 61 of the Complaint for want of knowledge.

62. Lorain County denies the allegations in paragraph 62 of the Complaint for want of knowledge.

63. Lorain County denies the allegations in paragraph 63 of the Complaint for want of knowledge.

64. Lorain County denies the allegations in paragraph 64 of the Complaint for want of knowledge.

65. Lorain County denies the allegations in paragraph 65 of the Complaint for want of knowledge.

66. Lorain County denies the allegations in paragraph 66 of the Complaint for want of knowledge.

67. For the allegations in paragraph 67 of the Complaint, Lorain County avers that the allegations reference material not attached to the Complaint. To the extent the allegations contained in paragraph 67 reference material not attached to the Complaint, such material speaks for itself. For that reason, Lorain County denies the allegations contained in paragraph 67 of the Complaint.

68. Lorain County denies the allegations in paragraph 68 of the Complaint for want of knowledge.

69. Lorain County denies the allegations in paragraph 69 of the Complaint for want of knowledge.

70. Lorain County denies the allegations in paragraph 70 of the Complaint for want of knowledge.

71. Lorain County denies the allegations in paragraph 71 of the Complaint.
72. Lorain County denies the allegations in paragraph 72 of the Complaint.
73. Lorain County denies the allegations in paragraph 73 of the Complaint for want of knowledge.
74. Lorain County denies the allegations in paragraph 74 of the Complaint.
75. Lorain County denies the allegations in paragraph 75 of the Complaint.
76. Lorain County denies the allegations in paragraph 76 of the Complaint.
77. Lorain County denies the allegations in paragraph 77 of the Complaint.
78. Lorain County denies the allegations in paragraph 78 of the Complaint.
79. Lorain County denies the allegations in paragraph 79 of the Complaint.
80. Lorain County denies the allegations in paragraph 80 of the Complaint.
81. Lorain County denies the allegations in paragraph 81 of the Complaint.
82. Lorain County denies the allegations in paragraph 82 of the Complaint.
83. Lorain County denies the allegations in paragraph 83 of the Complaint.
84. Lorain County denies the allegations in paragraph 84 of the Complaint.
85. The allegations in paragraph 85 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 85 of the Complaint.
86. The allegations in paragraph 86 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 86 of the Complaint.
87. Lorain County denies the allegations in paragraph 87 of the Complaint.
88. Lorain County admits the allegations in paragraph 88 of the Complaint.

89. Lorain County denies the allegations in paragraph 89 of the Complaint for want of knowledge.

90. Lorain County denies the allegations in paragraph 90 of the Complaint.

91. Lorain County denies the allegations in paragraph 91 of the Complaint.

92. For the allegations in paragraph 92 of the Complaint, Lorain County avers that the allegations reference material not attached to the Complaint. To the extent the allegations contained in paragraph 92 reference material not attached to the Complaint, such material speaks for itself. For that reason, Lorain County denies the allegations contained in paragraph 92 of the Complaint.

93. Lorain County denies the allegations in paragraph 93 of the Complaint.

94. Lorain County denies the allegations in paragraph 94 of the Complaint.

95. Lorain County denies the allegations in paragraph 95 of the Complaint.

96. Lorain County denies the allegations in paragraph 96 of the Complaint for want of knowledge.

97. Lorain County denies the allegations in paragraph 97 of the Complaint for want of knowledge.

98. Lorain County denies the allegations in paragraph 98 of the Complaint for want of knowledge.

99. Lorain County denies the allegations in paragraph 99 of the Complaint for want of knowledge.

100. Lorain County denies the allegations in paragraph 100 of the Complaint for want of knowledge.

101. Lorain County denies the allegations in paragraph 101 of the Complaint for want of knowledge.

102. Lorain County denies the allegations in paragraph 102 of the Complaint for want of knowledge.

103. Lorain County denies the allegations in paragraph 103 of the Complaint for want of knowledge.

104. Lorain County denies the allegations in paragraph 104 of the Complaint for want of knowledge.

105. Lorain County denies the allegations in paragraph 105 of the Complaint for want of knowledge.

106. Lorain County denies the allegations in paragraph 106 of the Complaint for want of knowledge.

107. Lorain County denies the allegations in paragraph 107 of the Complaint for want of knowledge.

108. Lorain County denies the allegations in paragraph 108 of the Complaint for want of knowledge.

109. Lorain County denies the allegations in paragraph 109 of the Complaint for want of knowledge.

110. Lorain County denies the allegations in paragraph 110 of the Complaint for want of knowledge.

111. Lorain County denies the allegations in paragraph 111 of the Complaint for want of knowledge.

112. Lorain County denies the allegations in paragraph 112 of the Complaint.

113. Lorain County denies the allegations in paragraph 113 of the Complaint.

114. For the allegations in paragraph 114 of the Complaint, Lorain County avers that the allegations reference material not attached to the Complaint. To the extent the allegations contained in paragraph 114 reference material not attached to the Complaint, such material speaks for itself. For that reason, Lorain County denies the allegations contained in paragraph 114 of the Complaint.

115. Lorain County denies the allegations in paragraph 115 of the Complaint for want of knowledge.

116. Lorain County denies the allegations in paragraph 116 of the Complaint.

117. Lorain County denies the allegations in paragraph 117 of the Complaint.

118. For the allegations in paragraph 118 of the Complaint, Lorain County admits only that on February 25, 2022, Lorain County Common Pleas Judge D. Christopher Cook granted a new trial to Plaintiff in case number 94CR045368, and immediately thereafter, the Lorain County Prosecuting Attorney dismissed all charges against Plaintiff. Lorain County denies the remaining allegations in paragraph 118 of the Complaint.

119. For the allegations in paragraph 119 of the Complaint, Lorain County avers that the allegations reference material not attached to the Complaint. To the extent the allegations contained in paragraph 119 reference material not attached to the Complaint, such material speaks for itself. For that reason, Lorain County denies the allegations contained in paragraph 119 of the Complaint.

120. The allegations in paragraph 120 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 120 of the Complaint.

121. Lorain County denies the allegations in paragraph 121 of the Complaint.

122. Lorain County denies the allegations in paragraph 122 of the Complaint for want of knowledge.

123. The allegations in paragraph 123 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 123 of the Complaint.

124. Lorain County denies the allegations in paragraph 124 of the Complaint.

125. Lorain County denies the allegations in paragraph 125 of the Complaint for want of knowledge.

126. Lorain County denies the allegations in paragraph 126 of the Complaint for want of knowledge.

127. The allegations in paragraph 127 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 127 of the Complaint.

128. The allegations in paragraph 128 of the Complaint contain hyperbole to which no response is required. To the extent a response is required, Lorain County denies the allegations in paragraph 128 of the Complaint.

129. Lorain County denies the allegations in paragraph 129 of the Complaint for want of knowledge.

130. Lorain County denies the allegations in paragraph 130 of the Complaint for want of knowledge.

131. Lorain County denies the allegations in paragraph 131 of the Complaint for want of knowledge.

132. Lorain County denies the allegations in paragraph 132 of the Complaint.

133. Lorain County denies the allegations in paragraph 133 of the Complaint.

134. Lorain County denies the allegations in paragraph 134 of the Complaint.

135. Lorain County restates its answers to paragraphs 1 through 134 of the Complaint as if fully rewritten herein.

136. Lorain County denies the allegations in paragraph 136 of the Complaint.

137. Lorain County denies the allegations in paragraph 137 of the Complaint.

138. Lorain County denies the allegations in paragraph 138 of the Complaint.

139. Lorain County denies the allegations in paragraph 139 of the Complaint.

140. Lorain County denies the allegations in paragraph 140 of the Complaint.

141. Lorain County denies the allegations in paragraph 141 of the Complaint.

142. Lorain County denies the allegations in paragraph 142 of the Complaint.

143. Lorain County denies the allegations in paragraph 143 of the Complaint.

144. Lorain County denies the allegations in paragraph 144 of the Complaint.

145. Lorain County restates its answers to paragraphs 1 through 144 of the Complaint as if fully rewritten herein.

146. Lorain County denies the allegations in paragraph 146 of the Complaint.

147. Lorain County denies the allegations in paragraph 147 of the Complaint.

148. Lorain County denies the allegations in paragraph 148 of the Complaint.

149. Lorain County denies the allegations in paragraph 149 of the Complaint.

150. Lorain County denies the allegations in paragraph 150 of the Complaint.

151. Lorain County denies the allegations in paragraph 151 of the Complaint.

152. Lorain County denies the allegations in paragraph 152 of the Complaint.



153. Lorain County denies the allegations in paragraph 153 of the Complaint.

154. Lorain County denies the allegations in paragraph 154 of the Complaint.

155. Lorain County denies the allegations in paragraph 155 of the Complaint.

156. Lorain County restates its answers to paragraphs 1 through 155 of the Complaint as if fully rewritten herein.

157. Lorain County denies the allegations in paragraph 157 of the Complaint.

158. Lorain County denies the allegations in paragraph 158 of the Complaint.

159. Lorain County denies the allegations in paragraph 159 of the Complaint.

160. Lorain County denies the allegations in paragraph 160 of the Complaint.

161. Lorain County denies the allegations in paragraph 161 of the Complaint.

162. Lorain County denies the allegations in paragraph 162 of the Complaint.

163. Lorain County restates its answers to paragraphs 1 through 162 of the Complaint as if fully rewritten herein.

164. Lorain County denies the allegations in paragraph 164 of the Complaint.

165. Lorain County denies the allegations in paragraph 165 of the Complaint.

166. Lorain County denies the allegations in paragraph 166 of the Complaint.

167. Lorain County denies the allegations in paragraph 167 of the Complaint.

168. Lorain County denies the allegations in paragraph 168 of the Complaint.

169. Lorain County denies the allegations in paragraph 169 of the Complaint.

170. Lorain County restates its answers to paragraphs 1 through 169 of the Complaint as if fully rewritten herein.

171. Lorain County denies the allegations in paragraph 171 of the Complaint.

172. Lorain County denies the allegations in paragraph 172 of the Complaint.

173. Lorain County denies the allegations in paragraph 173 of the Complaint.

174. Lorain County denies the allegations in paragraph 174 of the Complaint.

175. Lorain County restates its answers to paragraphs 1 through 174 of the Complaint as if fully rewritten herein.

176. Lorain County denies the allegations in paragraph 176 of the Complaint for want of knowledge.

177. Lorain County denies the allegations in paragraph 177 of the Complaint for want of knowledge.

178. Lorain County denies the allegations in paragraph 178 of the Complaint for want of knowledge.

179. Lorain County denies the allegations in paragraph 179 of the Complaint for want of knowledge.

180. Lorain County restates its answers to paragraphs 1 through 179 of the Complaint as if fully rewritten herein.

181. Lorain County denies the allegations in paragraph 181 of the Complaint.

182. Lorain County denies the allegations in paragraph 182 of the Complaint.

183. Lorain County denies the allegations in paragraph 183 of the Complaint.

184. Lorain County denies the allegations in paragraph 184 of the Complaint.

185. Lorain County restates its answers to paragraphs 1 through 184 of the Complaint as if fully rewritten herein.

186. Lorain County denies the allegations in paragraph 186 of the Complaint.

187. Lorain County denies the allegations in paragraph 187 of the Complaint.

188. Lorain County denies each and every allegation in the Complaint not specifically admitted herein as true.

189. Lorain County denies each and every allegation contained in the unnumbered section headings throughout the Complaint.

190. Lorain County denies each and every allegation contained in the prayer for relief.

191. Lorain County explicitly denies any wrongdoing or unlawful act.

FIRST DEFENSE

192. The Complaint fails, in whole or in part, to state a claim upon which relief can be granted.

SECOND DEFENSE

193. Plaintiff has or may have failed to exhaust all administrative or statutory remedies.

THIRD DEFENSE

194. Plaintiff's conduct, in whole or in part, bars Plaintiff's claims for relief.

FOURTH DEFENSE

195. Plaintiff's Complaint is barred, in whole or in part, by the doctrine of consent.

FIFTH DEFENSE

196. Plaintiff's claims may be barred by the applicable statutes of limitations.

SIXTH DEFENSE

197. Plaintiff's claims are barred by the doctrines of laches, waiver, and/or estoppel.

SEVENTH DEFENSE

198. Plaintiff's claims for damages may be barred, in whole or in part, by prior subsequent intervening or superseding acts, omissions, or causes, and/or by the acts or omissions of individuals or entities over whom Lorain County has no control or right of control.

EIGHTH DEFENSE

199. Plaintiff's claims are barred due to a failure to join necessary and indispensable parties.

NINTH DEFENSE

200. Plaintiff is barred from relief because Lorain County acted in good faith and in accordance with the law.

TENTH DEFENSE

201. Lorain County affirmatively denies that Lorain County breached any duty owed to Plaintiff.

ELEVENTH DEFENSE

202. Lorain County's actions herein met the test of reasonableness in all fashions and, as a result thereof, no actions for violations of any duty to Plaintiff are maintainable.

TWELFTH DEFENSE

203. Plaintiff's claims may be barred, in whole or in part, by a failure to mitigate damages.

THIRTEENTH DEFENSE

204. Lorain County did not adopt or promulgate an official policy that contributed to or caused Plaintiff's alleged injuries.

FOURTEENTH DEFENSE

205. Lorain County did not develop or promote any practice or custom that, although not officially authorized, is widespread and well-settled within Lorain County which contributed to or caused Plaintiff's alleged injuries.

FIFTEENTH DEFENSE

206. Lorain County did not contribute to or cause Plaintiff's alleged injuries through any actions of any Lorain County official with final policy-making authority.

SIXTEENTH DEFENSE

207. Lorain County asserts the defense of contributory/comparative negligence.

SEVENTEENTH DEFENSE

208. Plaintiff's claims may be barred in whole or in part by a lack of capacity and/or standing to seek the relief for which he prays, or because this matter is non-justiciable.

EIGHTEENTH DEFENSE

209. To the extent Plaintiff seeks punitive damages, the Complaint fails to state facts sufficient to entitle Plaintiff to an award of punitive damages against Lorain County.

NINETEENTH DEFENSE

210. To the extent Plaintiff seeks punitive damages, Plaintiff's claims for punitive damages cannot be sustained because the conduct of Lorain County did not show complete indifference to or conscious disregard for the safety or constitutional rights of others.

TWENTIETH DEFENSE

211. To the extent Plaintiff seeks punitive damages or exemplary damages against Lorain County, an award of those types is contrary to the United States and Ohio Constitutions, as well as federal and state statutes, and is therefore not available to Plaintiff.

TWENTY-FIRST DEFENSE

212. Lorain County is entitled to immunity, including statutory, absolute, and qualified immunity, and also immunity from punitive and other damages.

TWENTY-SECOND DEFENSE

213. Some or all of Plaintiff's claims against Lorain County are expressly subject to, barred or limited by the provisions of Ohio's Political Subdivision Tort Immunity Statute, Ohio Revised Code § 2744.

TWENTY-THIRD DEFENSE

214. Lorain County is entitled to a setoff of damages and/or limitation of damages pursuant to statute.

TWENTY-FOURTH DEFENSE

215. Lorain County is entitled to a setoff of damages and/or limitation of damages pursuant to any settlement or judgment obtained with respect to any claims levied by Plaintiff against the State of Ohio based upon her alleged wrongful incarceration, including but not limited to any settlement or judgment obtained by Plaintiff in Lorain County Common Pleas Court Case No. 2022 CV 205613, *Nancy Smith v. State of Ohio*.

TWENTY-FIFTH DEFENSE

216. Lorain County is not *sui juris*, or a properly named legal entity capable of being sued.

TWENTY-SIXTH DEFENSE

217. The Complaint fails to connect any actionable behavior of Lorain County with any cognizable claim.

TWENTY-SEVENTH DEFENSE

218. The Complaint attributes liability to Lorain County exclusively under a theory of *respondeat superior*, which is not a viable theory of liability under 42 U.S.C. § 1983 as a matter of law.

TWENTY-EIGHTH DEFENSE

219. Lorain County hereby gives notice it intends to rely upon and utilize any other affirmative defenses that might become available or apparent during the course of discovery and hereby reserves the right to amend this Answer to assert such defense or defenses.

WHEREFORE, Defendant Lorain County, Ohio demands Plaintiff's claims against it be dismissed in their entirety and with prejudice.

Respectfully submitted,

/s/ David C. Moser
Daniel T. Downey (0063753)
David C. Moser (0090834)
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*Counsel for Defendants Jonathan Rosenbaum
and Lorain County*

JURY DEMAND

Defendant Lorain County, Ohio hereby demands a trial by jury on all issues herein triable.

/s/ David C. Moser
David C. Moser (0090834)
FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLC
*Counsel for Defendants Jonathan Rosenbaum
and Lorain County*



CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Answer was served, via the Court's CM/ECF system, upon all counsel this 16th day of April 2024.

And by regular mail to:

Margaret Grondin
27409 Detroit Road, Apt. G10
Westlake, OH 44145
Defendant

/s/ David C. Moser

David C. Moser (0090834)

FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLC

*Counsel for Defendants Jonathan Rosenbaum
and Lorain County*